

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2019 SEP -4 PM 3:28

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UNITED STATES OF AMERICA

Plaintiff,

v.

NO. 19-MC-

74

\$104,799.00 IN U.S. CURRENCY

Defendant *in rem*.

**JOINT MOTION TO EXTEND
TIME TO FILE JUDICIAL FORFEITURE ACTION**

The United States of America and Claimant Diana Arreguin, through her attorney of record, Dimitri Dube, jointly move, pursuant to 18 U.S.C. § 983(a)(3)(A), for a 45-day extension of time to file a judicial action regarding property to which Arreguin has filed a claim in an administrative forfeiture proceeding with the Drug Enforcement Administration (DEA), and in support state:

1. DEA seized \$104,799.00 in U.S. Currency on or about March 21, 2019, from Angel Alderete in Dallas, Texas.
2. DEA sent written notice of intent to forfeit the seized property to all potentially interested parties as required by 18 U.S.C. § 983(a)(1)(A). On June 17, 2019, Diana Arreguin, through her attorney of record, Dimitri Dube filed a claim to \$100,000.00 out of the \$104,799.00 in U.S. Currency with the DEA.

3. No other person has filed a claim to the property, and the time to do so under 18 U.S.C. § 983(a)(2)(A)-(E) has expired.

4. According to 18 U.S.C. § 983(a)(3)(A)-(C), the United States is to file a judicial forfeiture action not later than 90 days after a claim has been filed or return the seized property pending such filing, except that a court may extend the filing period for good cause shown or upon agreement of the parties.

5. Unless the court extends the judicial filing deadline for good cause or upon agreement of the parties, the 90-day period that began with Arreguin's claim expires on September 15, 2019.

CONCLUSION

Therefore, the parties request an order to extend the filing period for a judicial forfeiture action to and including October 30, 2019.

Respectfully submitted,

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